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20 **UNITED STATES DISTRICT COURT**
21 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

22 Rivera Martinez, et al.,

23 Plaintiffs,

24 v.

25 The Geo Group, Inc., et al.,

26 Defendants.

Case No. 5:18-cv-01125-R-GJS
Assigned to: Hon. Manuel L. Real

**PLAINTIFFS' REPLY IN
SUPPORT OF NOTICE OF
RELATED CASE [Doc. #10]**

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1 Defendants GEO Group and Duran argue that the cases should not be related
2 because they do not state identical legal claims -- an observation Plaintiffs do not
3 dispute. But that is not the inquiry the Court must make in determining how to act
4 on Plaintiffs' Notice.

5 As Plaintiffs state in their Notice [Doc. #10], the factual issues we will be
6 litigating in this action will intersect considerably, particularly in the discovery
7 phase, with the factual issues the *Novoa* action will be litigating. In *Novoa*, the
8 plaintiffs are arguing that GEO Group violated the law in a myriad of ways, and
9 that it did so by preying on the detainee-plaintiffs at Adelanto (from 2011 to the
10 present) by subjecting them to appallingly sub-standard living conditions, denying
11 them adequate food and drinking water, restricting their access to counsel and their
12 families, degrading them and verbally abusing them, retaliating against them by
13 improperly placing them in segregation, and denying them adequate medical care.
14 The violations Plaintiffs allege in this action occurred against that precise
15 backdrop: those are literally the allegations the instant Plaintiffs were attempting to
16 bring to the attention of ICE officials on the day they were attacked by the GEO
17 Group guards.

18 As this Court may have seen, Defendant GEO Group categorically denied
19 each of Plaintiffs' allegations in its Answer [Doc. #8]. There is no doubt, then,
20 that the discovery into each of these issues will be substantial -- just as it will be in
21 *Novoa*. And, as the undersigned counsel know from their decades of experience
22 litigating these types of cases, that process is likely to require court involvement on
23 issues such as scope, privilege, protective orders and the like -- just as it will in
24 *Novoa*. The two cases will, then, involve substantially related and similar
25 questions of law and fact that could, if litigated before two different courts, result
26 in inconsistent rulings. The litigation of the two cases in two separate fora will
27 also result in substantive duplication of labor by the two courts.

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1 If Defendants' characterization of the two cases was correct, then the Court
2 would be correct in refusing to relate the cases. But it is not. To conserve judicial
3 economy, and to ensure consistency in the rulings that will significantly impact the
4 trajectory of both actions, this case should be related to the *Novoa* action.

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6 Dated: June 20, 2018 Respectfully submitted,

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12 By: /s/ Rachel Steinback
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